

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit 44

1
2 IN THE UNITED STATES DISTRICT COURT.
3 FOR THE DISTRICT OF SOUTH CAROLINA
4 COLUMBIA DIVISION

5 -----x
6 THE SOUTH CAROLINA STATE CONFERENCE
7 OF THE NAACP

8 and

9
10 TAIWAN SCOTT, ON BEHALF OF HIMSELF Case No.
11 AND ALL OTHER SIMILARLY SITUATED 3:21-CV-03302
12 PERSONS, JMC-TJH-RMG

13 Plaintiffs,

14 Vs.

15 THOMAS C. ALEXANDER, IN HIS OFFICIAL
16 CAPACITY AS PRESIDENT OF THE SENATE;
17 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY
18 AS CHAIRMAN OF THE SENATE JUDICIARY
19 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL
20 CAPACITY AS SPEAKER OF THE HOUSE OF
21 REPRESENTATIVES; CHRIS MURPHY, IN HIS
22 OFFICIAL CAPACITY AS CHAIRMAN OF THE
23 HOUSE OF REPRESENTATIVES JUDICIARY
24 COMMITTEE; WALLACE H. JORDAN, IN HIS
25 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE
OF REPRESENTATIVES ELECTIONS LAW
SUBCOMMITTEE; HOWARD KNAPP, IN HIS
OFFICIAL CAPACITY AS INTERIM EXECUTIVE
DIRECTOR OF THE SOUTH CAROLINA STATE
ELECTION COMMISSION; JOHN WELLS, JOANNE
DAY, CLIFFORD J. EDLER, LINDA MCCALL,
AND SCOTT MOSELEY, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE SOUTH
CAROLINA STATE ELECTION COMMISSION,
Defendants.

-----x
26
27 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION
28 BETH BERNSTEIN
29 Wednesday, August 10, 2022
30

BERNSTEIN

-- and I guess maybe North Charleston would typically be more Democratic was now being moved into CD 6, in my opinion, and how I saw the trend in Charleston going more as a moderate leaning left area that has kind of changed definitely since 2011 and that there was an effort to make sure that that area was going to be distributed in an effort not to have it as a voting bloc but to help CD 1.

Q. Did you think that Charleston County, including its downtown area, would be considered a community of interest?

A. I did.

Q. And so this alternative one plan by the House, do you know when it was released?

A. So I'm not sure when it was released. I happened to be on a family vacation around Christmastime and I had somebody send me a text

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BERNSTEIN

about the new map being released and I did not know what he was referring to when he stated the new map. I said, you know, so that's the first time I had heard about it.

So it was a map that had been published online. But as a committee member had not been given any notice that there would be an alternative map produced and that it would be produced at that time and I could not even tell you, it was somewhere between probably December 20th and December 26th I think is when I was told, maybe December 9th.

Q. You just said someone had contacted you to let you know about that new map, correct?

A. Correct.

Q. Do you remember who that was?

A. I do. It was a friend who -- it was through a text exchange,